REMARKS

This Application has been carefully reviewed in light of the Office Action dated October 8, 2008 (*"Office Action"*). At the time of the *Office Action*, Claims 1-18 and 20-32 were pending and rejected. Applicants have amended Claims 1, 9, and 14-17; and cancelled Claims 19, 21, 23, 25, 27, 29, and 31. Applicants respectfully request reconsideration and allowance of all pending claims.

Section 103 Rejections

The Examiner rejects Claims 1-18 and 20-32 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0018078 A1 to Khan et al. (*"Khan"*), U.S. Patent No. 6,792,475 B1 to Arcuri et al. (*"Arcuri"*) and U.S. Patent No. 7,085,994 B2 issued to Gvily (*"Gvily"*). Certain claim elements of dependent Claims 21, 23, 25, 27, 29, and 31 have been incorporated into independent Claims 1, 9, 14, 15, 16, and 17, respectively. Claims 21, 23, 25, 27, and 29 have been cancelled. For at least the following reasons, Applicants respectfully request reconsideration and allowance of Claims 1-18, 20, 22, 24, 26, 28, and 30.

A. Claims 1-8, 14-18, 20, 22, 24, 26, 28, and 30

Independent Claim 1 of the present Application, as amended, recites *inter alia*:

> using stored user instructions to determine the placement of the selected elements in the composite webpage; and
> rendering the identified portion of content corresponding to the at least one HTML tag to form the composite web page, the identified portion placed according to the user instructions.

Claims 14, 15, 16, and 17 recite certain analogous limitations. It continues to be Applicants' position that this combination of features is not disclosed, taught, or suggested in the prior art of record.

In the *Office Action*, the Examiner relies upon *Gvily*, specifically, for disclosure of the recited claim elements. However, the cited portion of *Gvily* discloses only that "[o]nce the user confirms his selection, it is translated into a query that uniquely identifies the snippet 904." (*Gvily*, Column 9, lines 28-29). The query, which comprises "the URL of the page

420 being viewed and additional information to identify the logical unit selected within that page 420," is sent "to a portal server 416 that stores the query as a new snippet (for that particular user, for any other user or for none at all) in its user information database 424." (*Gvily*, Column 9, lines 29-36). According to *Gvily*, "[t]he next time the user requests the user's custom portal page 422, the user is presented with a page 422 containing the newly selected snippet 904, as illustrated by Fig. 9." (*Gvily*, Column 9, lines 36-39). Thus, *Gvily* only discloses that the selected snippet is stored as a user selection in the user information database and that the snippet can then be presented to the user when requested. There is no disclosure in *Gvily* of "using stored user instructions **to determine the placement of the selected elements in the composite webpage**" and "rendering the identified portion of content . . . **the identified portion placed according to the user instructions**," as recited in independent Claim 1 and analogously recited in independent Claims 14, 15, 16, and 17.

As shown by Applicant in the previous Response to Office Action submitted on June 10, 2008, *Khan*, which is relied upon for disclosure of "rendering the at least one element to form the composite web page," also does not disclose the recited claim elements. *Khan* merely discloses an interface "which allows a user to select and manage information that is displayed on an information screen . . . [that] can be a web page or any other content source." (*Khan*, page 1, paragraph 7). According to *Khan*, "the information screen may include a potential plurality of different pages or "views." (*Khan*, Page 1, paragraph 8). However, *Khan* only discloses that "[e]ach view may contain at least one section or a 'window' for displaying the marked information" and "the user may be allowed to select, maximize, minimize, refresh and edit the content of the window." (*Khan*, Page 6, paragraph 75). Specifically, "each particular window contains hyperlinks that have been selected by the user from web-sites of his/her choice." (*Khan*, Page 6, paragraph 80). Thus, a user is able to customize the views by selecting the hyperlinks that will be displayed there. There is no disclosure in *Khan*, however, of "using stored user instructions **to determine the placement of the selected elements in the composite webpage**" and "rendering the identified portion of content . . . **the identified portion placed according to the user instructions**," as recited in independent Claim 1 and analogously recited in independent Claims 14, 15, 16, and 17.

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claims 1, 14, 15, 16, and 17, together with Claims 2-8 that depend on Claim 1.

B.   Claims 9-13

Independent Claim 9 of the present Application, as amended, recites that rendering the identified portion of content to form the composite web page comprises:

> using stored user instructions to determine the relative placement of the selected elements with respect to each other in the composite webpage; and
> rendering the identified portion of content corresponding to the at least one HTML tag to form the composite web page, the identified portion placed relative to other selected elements according to the user instructions.

It is Applicants' position that this combination of features is not disclosed, taught, or suggested in the prior art of record.

In the *Office Action*, the Examiner relies upon *Gvily*, specifically, for disclosure of certain similar claim elements formerly recited in Claim 23. However, the cited portion of *Gvily* discloses only that "[o]nce the user confirms his selection, it is translated into a query that uniquely identifies the snippet 904." (*Gvily*, Column 9, lines 28-29). The query, which comprises "the URL of the page 420 being viewed and additional information to identify the logical unit selected within that page 420," is sent "to a portal server 416 that stores the query as a new snippet (for that particular user, for any other user or for none at all) in its user information database 424." (*Gvily*, Column 9, lines 29-36). According to *Gvily*, "[t]he next time the user requests the user's custom portal page 422, the user is presented with a page 422 containing the newly selected snippet 904, as illustrated by Fig. 9." (*Gvily*, Column 9, lines 36-39). Thus, *Gvily* only discloses that the selected snippet is stored as a user selection in the user information database and that the snippet can then be presented to the user when requested. There is no disclosure in *Gvily* of "using stored user instructions to determine the **relative placement of the selected elements with respect to each other in the composite webpage**" and "rendering the identified portion of content . . . the identified portion **placed**

relative to other selected elements according to the user instructions," as recited in independent Claim 9.

As shown by Applicant in the previous Response to Office Action submitted on June 10, 2008, *Khan*, which is relied upon for disclosure of "rendering the at least one element to form the composite web page," also does not disclose the recited claim elements. *Khan* merely discloses an interface "which allows a user to select and manage information that is displayed on an information screen . . . [that] can be a web page or any other content source." (*Khan*, page 1, paragraph 7). According to *Khan*, "the information screen may include a potential plurality of different pages or "views." (*Khan*, Page 1, paragraph 8). However, *Khan* only discloses that "[e]ach view may contain at least one section or a 'window' for displaying the marked information" and "the user may be allowed to select, maximize, minimize, refresh and edit the content of the window." (*Khan*, Page 6, paragraph 75). Specifically, "each particular window contains hyperlinks that have been selected by the user from web-sites of his/her choice." (*Khan*, Page 6, paragraph 80). Thus, a user is able to customize the views by selecting the hyperlinks that will be displayed there. There is no disclosure in *Khan*, however, of "using stored user instructions to determine the **relative placement of the selected elements with respect to each other in the composite webpage**" and "rendering the identified portion of content . . . the identified portion **placed relative to other selected elements according to the user instructions**," as recited in independent Claim 9.

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 9, together with Claims 10-13 that depend on Claim 9.

III. No Waiver

All of Applicants' arguments and amendments are without prejudice and disclaimer. Additionally, Applicants have merely discussed example reasons for allowability sufficient to overcome the Examiner's rejections. Applicants reserve the right to discuss additional reasons for allowance, such as additional distinctions over the references cited, the improper combination of the cited references, or the improper use of one or more references as prior art, in a later Response or on Appeal, if appropriate. By not responding to additional

statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional
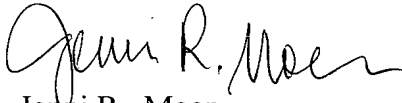
statements.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner believes that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Jenni R. Moen, Attorney for Applicants, at the Examiner's convenience at (214) 953-6809.

Applicants believe no fees are due; however, the Commissioner is hereby authorized to charge any fees or credits to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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Date: January 7, 2009
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